

Beth Rosin-Dietert

From: Michael Whitticar <mikew@novaiplaw.com>
Sent: Tuesday, July 7, 2020 4:51 PM
To: Frederick J. McCutchon
Cc: Rene Obregon; Mariah N. Mauck; Beth Rosin-Dietert
Subject: Re: Confidential: STLB v. Baldridge

I am told there is no contract and no imminent sale.

What is your evidence to the contrary?

Please send us your sealed exhibits.

Thanks!

MCW

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On Tue, Jul 7, 2020 at 4:04 PM Frederick J. McCutchon <FJM@bwpc.com> wrote:

Counsel:

I am writing to advise you of an urgent matter that has come to our attention based on investigation and information received, which information we consider reliable.

We have been made aware that Glen Baldridge, the sole owner of FSSI (as admitted in Defendants' expert report), has plans to sell his business and cash out, thus liquidating significant assets and arranging to keep the proceeds of the sale out of the United States and away from his creditors, including STLB. It is our understanding that the sale is immediately imminent.

This is notice that STLB intends to file a request for immediate restraining and injunctive relief to prevent such fraudulent transaction.

Plaintiff is giving you notice of its intent to file for such relief, and proceed with presentation to the Court through hearing, on an emergency basis, and no later than Friday, July 10.

Please advise whether you will agree to give adequate assurance that such assets will not be conveyed away, and that Defendants will enter into an agreed order, to ensure that Mr. Baldridge will cancel all discussions of a sale of any

substantial assets, pending trial on the merits and final judgment, or such other arrangements that will adequately protect Plaintiff's rights, pending final judgment.

Frederick J. McCutchon

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